

1 UNITED STATES DISTRICT COURT

2 SOUTHERN DISTRICT OF TEXAS

3 THE HONORABLE GEORGE C. HANKS, JR., JUDGE PRESIDING

4 UNITED STATES OF AMERICA, No. 4:21-00009-1

5 Plaintiff,

6 VS.

7 ROBERT T. BROCKMAN,

8 Defendant.

9 STATUS CONFERENCE

10 OFFICIAL REPORTER'S TRANSCRIPT OF PROCEEDINGS

11 Houston, Texas

12 January 22, 2021

14 APPEARANCES:

15 For the Plaintiff: Corey Smith, Esq.
16 Eric Powers, Esq.

17 For the Defendant: Jason Varnado, Esq.

18 Reported by: Nichole Forrest, RDR, CRR, CRC
19 Official Court Reporter.
20 United States District Court.
21 Southern District of Texas
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22 Proceedings recorded by mechanical stenography.
23 Transcript produced by Reporter on computer.

24

25

1 PROCEEDINGS

2

3 (The following proceedings held in open court.)

4 (Proceedings held via Zoom.)

5 * * *

6
7 12:18:49 THE COURT: Great. Welcome, everyone.8 12:18:51 I apologize for the delay. I'm in the middle of a
9 12:18:54 bench trial on another Zoom trial and it just went a
10 12:18:57 little long this afternoon before the break.11 12:19:00 I have reviewed the materials in this
12 12:19:02 case that have been submitted by the parties. And
13 12:19:04 the first thing I wanted to talk to you is just
14 12:19:07 about how this case is going to proceed; sort of a
15 12:19:10 plan for going forward.16 12:19:17 I did read the transcript of the
17 12:19:19 hearing that you had before Judge Edison, and the
18 12:19:22 issues that you wanted to raise with me on possibly
19 12:19:26 a competency hearing and other things.20 12:19:28 So let me start with the government
21 12:19:30 exactly. Have you talked to defense counsel about a
22 12:19:34 comprehensive plan for moving forward?23 12:19:38 MR. SMITH: Yes, Your Honor, we have.
24 12:19:40 We've been conferring. The government -- this is
25 12:19:43 edited from the pleadings. The government agrees

12:19:45 1 that a competency hearing is appropriate here. We
12:19:47 2 don't object. We do have some issues on discovery.
12:19:49 3 But we can address that at another time.

12:19:52 4 So there has been almost no discovery
12:19:56 5 of medical records to prepare for the competency
12:19:58 6 hearing.

12:19:59 7 So we do have a proposal. The
12:20:02 8 government plans on issuing some subpoenas, probably
12:20:04 9 next week to obtain some of the defendant's medical
12:20:07 10 records. We anticipate filing a motion.

12:20:09 11 We would ask the Court to ask that
12:20:12 12 those -- order those records be produced in 30 days.
12:20:15 13 We're probably going to need another 30 days for our
12:20:18 14 experts to evaluate those, write reports, exchange
12:20:21 15 those reports.

12:20:22 16 So in short, we're talking about at
12:20:24 17 least 90 days before we can actually have a
12:20:27 18 competency hearing. And we're probably -- just to
12:20:33 19 be on the safe side, we're talking about sometime in
12:20:36 20 June for a competency hearing.

12:20:38 21 Of course, we would ask that the time
12:20:39 22 between now and that competency hearing be excluded
12:20:44 23 under the Speedy Trial Act, which, of course, then
12:20:46 24 would push the trial back quite a bit.

12:20:50 25 THE COURT: Okay.

12:20:52 1 One quick thing. Ms. Clair, is the
12:20:52 2 court reporter on?

12:20:52 3 CASE MANAGER: Yes. You have Nichole
12:21:01 4 Forrest.

12:21:01 5 THE COURT: Oh, okay. Great. I just
12:21:01 6 wanted to make sure. I'm sorry, Ms. Forrest. I
12:21:02 7 wanted to make that you'd switched back from the
12:21:04 8 trial.

12:21:04 9 THE COURT REPORTER: Yes, Your Honor. I
12:21:12 10 apologize, Your Honor.

12:21:12 11 THE COURT: Not a problem.

12:21:13 12 I'm sorry, Mr. Smith. You can go
12:21:14 13 ahead. I just wanted to make sure we're on the
12:21:17 14 record.

12:21:19 15 MR. SMITH: Sure, Your Honor. No
12:21:19 16 problem. So in -- counsel, as I said, we've
12:21:22 17 conferred. We have some discovery that needs to be
12:21:25 18 done. The government is going to be seeking to have
12:21:28 19 our experts evaluate Mr. Brockman, which is going to
12:21:31 20 take some time. They're going to need some time to
12:21:33 21 evaluate Mr. Brockman's medical records, minimum of
12:21:38 22 90 days just to get to that point.

12:21:40 23 We were looking at a possible
12:21:43 24 competency hearing sometime in June, which, of
12:21:46 25 course, we would have to push the trial date until

12:21:48 1 after that time.

12:21:53 2 MR. VARNADO: Your Honor, again, this is
12:21:54 3 Jason Varnado for Mr. Brockman. I just wanted to
12:21:57 4 respond a little bit to Mr. Smith.

12:21:59 5 That's absolutely correct. We've been
12:21:59 6 trying to work cooperatively with the government to
12:22:02 7 sort of come up with a process of protocol for the
12:22:04 8 competency hearing now that the government has
12:22:07 9 agreed that a hearing is appropriate.

12:22:08 10 And assuming the Court agrees also, we
12:22:10 11 would prepare an order in this matter as opposed to
12:22:14 12 the one that was attached to the motion in the
12:22:17 13 Northern District of California, you know, that that
12:22:17 14 sets that forth; that the Court agrees and is
12:22:20 15 ordering that a competency hearing take place.

12:22:22 16 Also, I wanted to put on the record,
12:22:24 17 that the government has agreed that the evaluation
12:22:28 18 that would take place to lead up to that competency
12:22:30 19 hearing of Mr. Brockman is going to be a
12:22:32 20 non-custodial evaluation.

12:22:34 21 And they've agreed to that so that
12:22:36 22 their expert would come to Mr. Brockman's location
12:22:38 23 and conduct that examination there, as opposed to
12:22:40 24 any sort of custodial setting. I wanted to make
12:22:43 25 sure that was clear for the Court and get that

12:22:44 1 agreement on the record.

12:22:48 2 THE COURT: Great. Will you be able to
12:22:51 3 provide a -- an order for the Court that's signed
12:22:56 4 setting out the timetables that you would like the
12:22:59 5 Court to input?

12:23:01 6 If you could do that -- maybe let's
12:23:03 7 say by -- today is Friday -- by next Friday to have
12:23:06 8 that timetable in place?

12:23:09 9 And then with respect to the medical
12:23:13 10 records, have you guys talked about, you know, where
12:23:14 11 those records are, how difficult it's going to be to
12:23:17 12 produce them.

12:23:22 13 MR. VARNADO: So --

12:23:22 14 THE COURT: Oh, I'm sorry.

12:23:23 15 MR. VARNADO: I apologize, Judge. I'm
12:23:25 16 sorry, I think I interrupted you. We have had those
12:23:29 17 conversations. The awkwardness of the video, I
12:23:29 18 apologize.

12:23:31 19 So Mr. Smith had mentioned that
12:23:34 20 there's been almost no discovery. But attached to
12:23:36 21 the actual motion for the competency hearing are a
12:23:38 22 number of reports that contain, you know, medical
12:23:41 23 records and evaluations and things of that nature.

12:23:43 24 So there -- they do have that
12:23:45 25 information, which in many competency hearings or

12:23:48 1 context they're far ahead of where they normally
12:23:51 2 would be.

12:23:52 3 We've talked to the government about
12:23:53 4 their desire to subpoena medical records. And we do
12:23:56 5 not intend to impede their ability and their desire
12:23:59 6 to get relevant medical records pertaining to Mr.
12:24:03 7 Brockman's and that bear on his present health
12:24:05 8 condition that render him unable to assist in his
12:24:07 9 own defense.

12:24:09 10 We have heard from the government that
12:24:12 11 they're interested in sort of every doctor that's
12:24:14 12 ever examined Mr. Brockman, unbounded at the time.
12:24:14 13 And that's not going to work.

12:24:21 14 We're trying to figure out which of
12:24:23 15 these proposed subpoenas and parameters we can agree
12:24:24 16 to. And hopefully we don't have to bother the Court
12:24:26 17 with those. And it will be an unopposed motion.

12:24:32 18 But there may be some that -- where
12:24:32 19 the government is asking for more than we think that
12:24:34 20 there is required or appropriate for this particular
12:24:35 21 proceeding. And that that may be something that is
12:24:36 22 decided in a contested motion.

12:24:39 23 But to your question about schedule,
12:24:40 24 we absolutely should be able to set forth, and I
12:24:42 25 think we have agreed upon the general parameters of

12:24:43 1 what needs to take place. And could easily get that
12:24:46 2 on file for the Court to sign in short order, just
12:24:49 3 setting out the dates, leading up to a competency
12:24:51 4 hearing.

12:24:53 5 THE COURT: Great. If you could do that
12:24:54 6 by next Friday, that would be helpful.

12:24:56 7 And then if there is an agreement
12:25:00 8 on -- if there is an agreement on the production of
12:25:05 9 medical records, include that. If there isn't,
12:25:07 10 request another hearing. And then we'll have a
12:25:10 11 hearing on what -- you know, what needs to be done
12:25:13 12 about the medical records.

12:25:18 13 MR. SMITH: So the status of where we
12:25:20 14 are on obtaining medical records is we're preparing
12:25:22 15 to file a motion. There is an area where there is
12:25:27 16 an agreement. And there is an area where there is
12:25:28 17 not an agreement.

12:25:29 18 In the area where there is not an
12:25:31 19 agreement we are preparing a motion we hope to file
12:25:34 20 on Monday outlining those issues. And maybe perhaps
12:25:39 21 the Court may want to set that up for a hearing. We
12:25:42 22 can orally go into those. I'm sure the Court
12:25:44 23 doesn't want to go into them now.

12:25:47 24 THE COURT: No. I like to get the
12:25:49 25 motion filed. Give the other side a chance to

12:25:51 1 respond. And then we'll set a hearing.

12:25:54 2 MR. SMITH: Absolutely. We should have
12:25:55 3 our motion filed first thing next week.

12:25:58 4 THE COURT: If you could get it filed by
12:26:00 5 next Wednesday, that way I'll have that on the
12:26:03 6 record.

12:26:04 7 I'm just writing all this down. And
12:26:05 8 making deadlines so my case manager will know when
12:26:10 9 to expect things so that I'll know when to check up
12:26:13 10 on. So...

12:26:15 11 MR. SMITH: Very good, Your Honor.

12:26:16 12 THE COURT: Let's any motions for
12:26:18 13 medical records by Wednesday. If you give me by
12:26:22 14 next Friday, a schedule going forward, that would be
12:26:26 15 great.

12:26:27 16 Then also, my understanding was the
12:26:28 17 parties are going to file a stipulation regarding
12:26:32 18 excludable delay. Has that been done or --

12:26:38 19 MR. VARNADO: Judge, we presently have
12:26:39 20 delay excluded and agreed upon through, I believe,
12:26:41 21 what is currently set as a trial date in May. But
12:26:46 22 competency is one of those motions that by
12:26:48 23 excludable under speedy trial.

12:26:52 24 So we'll work with the government to
12:26:53 25 get whatever we need on file to ensure that we have

12:26:56 1 excludable delay and it's well documented, and if
12:26:59 2 it's okay with Your Honor up to and through the time
12:27:01 3 that a competency hearing is set. And, you know,
12:27:03 4 may even go beyond.

12:27:04 5 Whatever is easiest for the Court and
12:27:06 6 the government, we're happy to accommodate.

12:27:08 7 THE COURT: Okay. If you could, because
12:27:10 8 I thought that there was some issue that the time
12:27:13 9 for excludable delay might expire today. I wasn't
12:27:17 10 sure about that.

12:27:20 11 So is that not correct? I just wasn't
12:27:23 12 sure. I had seen something from my -- from my law
12:27:29 13 clerk on that issue. I just wanted to make sure
12:27:30 14 there was no problem.

12:27:33 15 MR. VARNADO: Judge, no, in your order
12:27:35 16 on document number -- Docket No. 17, January 15, you
12:27:39 17 entered an excludable delay order that runs from
12:27:42 18 January 15 through May 3rd of 2021.

12:27:42 19 THE COURT: Okay. Perfect.

12:27:45 20 MR. VARNADO: Pursuant to that, I think
12:27:46 21 we're covered for the short term.

12:27:47 22 THE COURT: Okay. Great.

12:27:49 23 Okay then. Is there anything else we
12:27:51 24 need to talk about? Once we get that schedule in
12:27:53 25 place, the motions filed, we can move forward.

12:27:56 1 Anything else that is going on?

12:27:58 2 One other thing. Just for the record,
12:28:00 3 I wanted to note, is that Mr. Brockman on the line?

12:28:06 4 MR. VARNADO: Mr. Brockman is on
12:28:08 5 by video. There are so many people on. I would
12:28:08 6 have to scroll over to see.

12:28:11 7 But, yes, it says Robert Brockman.
12:28:12 8 That is Mr. Brockman, Your Honor.

12:28:13 9 THE COURT: Great. I just wanted to
12:28:15 10 make sure that the record reflected that he is
12:28:17 11 present at the hearing.

12:28:19 12 MR. VARNADO: Great. Thank you.

12:28:20 13 THE COURT: Is there anything else we
12:28:21 14 need to talk about this afternoon?

12:28:24 15 MR. SMITH: Not from the prosecution
12:28:26 16 team for the government, Your Honor.

12:28:27 17 THE COURT: Mr. Varnado?

12:28:29 18 MR. VARNADO: Well, I'm waiting for
12:28:31 19 Mr. Powers who seems to be eagerly about to say
12:28:33 20 something. And since he's made an appearance here
12:28:34 21 on behalf of the taint team I may -- it is
12:28:37 22 appropriate to let him go first.

12:28:39 23 But we certainly are going to have
12:28:41 24 something to say with respect to his remarks.

12:28:43 25 THE COURT: Okay. Mr. Powers.

12:28:43 1 MR. POWERS: Your Honor, we would defer
12:28:46 2 to the defense as to whatever they'd like to raise.

12:28:51 3 We're here as our motion reflects in a
12:28:55 4 limited appearance capacity; simply to represent the
12:28:59 5 U.S. filter team in this matter to assist the Court
12:29:03 6 with the review of the search warrant.

12:29:04 7 So with that, I defer to Mr. Varnado.

12:29:05 8 MR. VARNADO: Well, then I will go ahead
12:29:09 9 and raise it, Judge. And, again, I know that the
12:29:11 10 Court prefers to have things on motions filed. And
12:29:15 11 it may be that we end up needing to file a motion to
12:29:18 12 compel.

12:29:19 13 But if -- with the Court's indulgence
12:29:21 14 I could preview perhaps what the taint team's role
12:29:23 15 is here and where there is a potential dispute
12:29:25 16 between the parties, if that would be agreeable to
12:29:27 17 the Court? It should not take too long.

12:29:30 18 THE COURT: Sure. I don't want to get
12:29:33 19 too much into the merits of discussion. Just give
12:29:35 20 me kind of 30,000-foot view, so I'll be prepared
12:29:39 21 when I get the motions. Whatever I receive, I'll be
12:29:41 22 able to get on it pretty quickly.

12:29:44 23 MR. VARNADO: The high level of this,
12:29:45 24 Judge, is that the prosecution team ran search
12:29:52 25 warrants at the residence -- the home office and a

12:29:55 1 storage facility of Mr. Brockman's tax lawyer in
12:29:58 2 August of 2018.

12:30:01 3 Over a series of dates there was
12:30:04 4 eventually a filter team protocol that was entered
12:30:06 5 by Judge Johnson in January of 2019. That set forth
12:30:10 6 the process by which the filter team should provide
12:30:15 7 the privilege holders documents such as Mr.
12:30:18 8 Brockman -- his document is in the possession of his
12:30:21 9 attorney -- so that Mr. Brockman could assert
12:30:23 10 privilege and could examine those materials.

12:30:27 11 In the Spring of 2019 and May of 2019,
12:30:29 12 we were assured that these documents would be
12:30:32 13 forthcoming soon. We had some letter exchanges,
12:30:36 14 both in June of 2019, and in January of 2020.

12:30:41 15 We asked Mr. Powers for those
12:30:43 16 documents. We still had not gotten the records
12:30:45 17 pursuant to Judge Johnson's protocol. And we heard
12:30:45 18 nothing in response to either of those letters. And
12:30:54 19 here we sit today and we still do not have those
12:30:56 20 documents.

12:30:58 21 I anticipate and the status report
12:31:00 22 that the government -- that the filter team filed
12:31:04 23 yesterday, which is Document No. 24, says that they
12:31:09 24 began reviewing the documents in 2019, so well over
12:31:12 25 a year ago, and believe they ran into a roadblock

12:31:15 1 due to a sealed matter in a different district. In
12:31:19 2 the Northern District of the California there is a
12:31:20 3 separate search warrant that. That matter is still
12:31:23 4 sealed. So I'm limited in what I can say.

12:31:28 5 But I want to tee up for the Court
12:31:29 6 that we think that there has been an incredible
12:31:31 7 amount of delay, inexcusable delay of very important
12:31:33 8 documents belonging to Mr. Brockman and the custody
12:31:36 9 of his tax lawyer -- and this is a tax case -- that
12:31:39 10 essentially the taint team has elected to not do
12:31:43 11 anything to address this perceived conflict -- and
12:31:45 12 we will represent that I'm comfortable saying when
12:31:47 13 you see it you will not think it is a conflict --
12:31:51 14 for over 13 months.

12:31:52 15 So we're at the point where now
12:31:55 16 Mr. Brockman is indicted. The filter team has had
12:31:58 17 these documents. And the government has had these
12:32:00 18 documents for close to three years; two-and-a-half
12:32:03 19 years at least.

12:32:04 20 And we're going to need to break this
12:32:05 21 log jam. And we don't think breaking the log jam is
12:32:08 22 anywhere as complicated as the filter team does.
12:32:10 23 They simply need to provide us with the records.

12:32:16 24 THE COURT: Great overview. Okay.
12:32:17 25 That's a great overview. I guess I just need the

12:32:20 1 appropriate motion now. There are motions that need
12:32:24 2 to be filed. They can be filed and I will key them
12:32:26 3 up. And we'll have oral argument and get to some
12:32:31 4 resolution so we can move forward.

12:32:34 5 MR. VARNADO: If I could there is --
12:32:37 6 Mr. Powers, I'm sorry. I didn't mean to cut you off
12:32:38 7 if you were going to say something.

12:32:40 8 MR. POWERS: Well, Your Honor, I think
12:32:43 9 that it's clear that you would like to rule on the
12:32:47 10 motions, and we'll certainly respond to anything
12:32:50 11 that Mr. Brockman's counsel provides.

12:32:55 12 Just what we would simply very shortly
12:32:58 13 provide to the Court is the fact that there is what
12:33:03 14 the filter team views as a conflict between the
12:33:08 15 rulings of another District Court and the rulings in
12:33:12 16 the Southern District of Texas from Judge Johnson
12:33:15 17 that prevented us upon reviewing -- upon actually
12:33:19 18 obtaining the documents and having them culled by
12:33:24 19 our litigation services team which took several
12:33:26 20 weeks, not months.

12:33:28 21 That prevented us from actually
12:33:30 22 permissibly being able to review them.

12:33:34 23 THE COURT: I'm sorry. I don't mean to
12:33:35 24 interrupt. But we're getting into the merits. I
12:33:39 25 don't really need to hear that right now. I need

12:33:40 1 to -- I want the parties to put it in writing and
12:33:44 2 paper. Because it's great to, you know, to hear the
12:33:50 3 arguments, but it's kind of like, it's not really
12:33:51 4 helpful because I can't do anything about it without
12:33:53 5 pleadings before me.

12:33:53 6 MR. POWERS: Very good, Your Honor. We
12:33:53 7 can rely on our pleadings for sure.

12:34:00 8 THE COURT: Okay. So submit to me
12:34:00 9 whatever you need me to look at. I'll get to it
12:34:04 10 quickly since I know this is top priority, and I
12:34:09 11 will get it resolved just as quickly as I can.

12:34:12 12 MR. VARNADO: Judge, if I could raise
12:34:14 13 just one more issue. I know you're in the middle --
12:34:15 14 this will not take time. This is not something I
12:34:18 15 think requires briefing.

12:34:20 16 Obviously, Mr. Brockman -- we believe
12:34:22 17 this case is likely not to proceed to trial due to
12:34:25 18 Mr. Brockman's health condition. But we have an
12:34:27 19 ethical obligation as attorneys to also begin to
12:34:30 20 prepare for trial in the event that we're
12:34:32 21 unsuccessful.

12:34:35 22 And the government has provided a vast
12:34:37 23 amount of discovery. They've given us five million
12:34:40 24 pages of documents. It's a big case. There's a lot
12:34:43 25 of records.

12:34:43 1 But we've repeatedly asked questions
12:34:45 2 about *Brady* material. And it -- gotten some sort of
12:34:49 3 unsatisfactory answers.

12:34:51 4 In particular, on a meet-and-confer on
12:34:53 5 December 10 of this last year, one of the
12:34:56 6 prosecutors from the Northern District, who is not
12:34:57 7 on this matter any more, you know, essentially
12:35:01 8 intonated he intended to hold back on *Brady* and
12:35:05 9 *Giglio* until the very end of the discovery process,
12:35:07 10 and that he didn't hand out such information
12:35:09 11 willy-nilly. And that government witnesses weren't
12:35:11 12 expecting that information to be released so
12:35:14 13 quickly.

12:35:14 14 A couple of weeks later we got a
12:35:16 15 letter from Mr. Smith that set forth in a one
12:35:21 16 paragraph letter, that their primary cooperating
12:35:23 17 witness of it to mean, who the government has
12:35:26 18 immunized in exchange for his cooperation with
12:35:29 19 Mr. Brockman, has made statements that are clearly
12:35:31 20 *Brady* material that he did not believe, meaning Mr.
12:35:34 21 Timine, that he was engaged in tax evasion or money
12:35:36 22 laundering when we worked for Mr. Brockman.

12:35:38 23 THE COURT: I don't mean to cut you off
12:35:40 24 again, but I think the quickest way to do this
12:35:44 25 efficiently is include a deadline for filing a

12:35:47 1 motion to produce that material as part of your
12:35:51 2 schedule with the Court. That way everybody will
12:35:53 3 know when to expect it. I'll know when to expect
12:35:55 4 it. And then we'll move on from there.

12:35:55 5 MR. VARNADO: I will certainly do that,
12:35:59 6 Your Honor.

12:35:59 7 THE COURT: You got arguments to make
12:36:00 8 and I don't want to, you know, cut you off. But
12:36:03 9 it's not really productive to talk about that right
12:36:05 10 now until I have the motions before me. And then
12:36:08 11 both sides get an opportunity to respond.

12:36:12 12 MR. VARNADO: Fair enough, Your Honor.
12:36:14 13 We'll make our *Brady* motion just so we can kindly
12:36:16 14 get that information.

12:36:16 15 Thank you very much.

12:36:17 16 THE COURT: Not a problem. And if you
12:36:18 17 could put that in your schedule, that you're going
12:36:21 18 to submit to the Court by next Friday, that is, give
12:36:23 19 me -- you don't -- obviously, if you're late or
12:36:26 20 whatever, that is not a problem. But just --
12:36:29 21 because this is a criminal case. But just submit to
12:36:30 22 me a date by which you plan to get that material to
12:36:34 23 me -- those motions to me.

12:36:36 24 If you can't, ask the Court for more
12:36:38 25 time. Obviously, I'm going to give it to you. This

12:36:41 1 is just more a place-marker so I'll know how the
12:36:44 2 case is proceeding and when to expect motions from
12:36:46 3 parties.

12:36:48 4 If you need more time, don't hesitate
12:36:49 5 to ask, but we do need, in effect, a scheduling
12:36:53 6 order in place.

12:36:55 7 MR. VARNADO: Very good, Your Honor.

12:36:57 8 THE COURT: Great.

12:36:58 9 Well, thank you all for being available.
12:37:00 10 I look forward to working with all of you in this
12:37:02 11 case. And I look forward to your filings next week.

12:37:08 12 Take care, everyone. Y'all may be
13 excused.

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15 (Proceedings concluded.)

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TELEPHONIC OR VIDEO CONFERENCE CERTIFICATE

4 I, Nichole Forrest, RDR, CRR, CRC,
5 certify that as an Official Court Reporter in the
6 United States District Court, Southern District of
7 Texas, I have transcribed the telephonic/video
8 conference hearing of the foregoing entitled case to
9 the best of my ability; that any indiscernible
10 designations are because of audio interference that
11 precluded me from understanding the words spoken;
12 and that the foregoing typewritten matter contains a
13 full, true and correct transcript of my
14 understanding of the aforesaid proceedings as
15 recorded to the best of my skill and ability.

19 /S/ Nichole Forrest

20 Nichole Forrest, RDR, CRR, CRC
21 Official Court Reporter

1	almost [2] - 3:4, 6:20 AMERICA [1] - 1:4 amount [2] - 14:7, 16:23 answers [1] - 17:3 anticipate [2] - 3:10, 13:21 apologize [4] - 2:8, 4:10, 6:15, 6:18 appearance [2] - 11:20, 12:4 APPEARANCES [1] - 1:14 appropriate [5] - 3:1, 5:9, 7:20, 11:22, 15:1 area [3] - 8:15, 8:16, 8:18 argument [1] - 15:3 arguments [2] - 16:3, 18:7 assert [1] - 13:9 assist [2] - 7:8, 12:5 assuming [1] - 5:10 assured [1] - 13:12 attached [2] - 5:12, 6:20 attorney [1] - 13:9 attorneys [1] - 16:19 audio [1] - 20:10 August [1] - 13:2 available [1] - 19:9 awkwardness [1] - 6:17	care [1] - 19:12 case [10] - 2:12, 2:14, 9:8, 14:9, 16:17, 16:24, 18:21, 19:2, 19:11, 20:8 CASE [1] - 4:3 certainly [3] - 11:23, 15:10, 18:5 CERTIFICATE [1] - 20:1 certify [1] - 20:5 chance [1] - 8:25 check [1] - 9:9 Clair [1] - 4:1 clear [2] - 5:25, 15:9 clearly [1] - 17:19 clerk [1] - 10:13 close [1] - 14:18 comfortable [1] - 14:12 compel [1] - 12:12 competency [15] - 2:19, 3:1, 3:5, 3:18, 3:20, 3:22, 4:24, 5:8, 5:15, 5:18, 6:21, 6:25, 8:3, 9:22, 10:3 complicated [1] - 14:22 comprehensive [1] - 2:22 computer [1] - 1:23 concluded [1] - 19:15 condition [2] - 7:8, 16:18 conduct [1] - 5:23 confer [1] - 17:4 conference [1] - 20:8 CONFERENCE [2] - 1:9, 20:1 conferred [1] - 4:17 conferring [1] - 2:24 conflict [3] - 14:11, 14:13, 15:14 contain [1] - 6:22 contains [1] - 20:12 contested [1] - 7:22 context [1] - 7:1 conversations [1] - 6:17 cooperating [1] - 17:16 cooperation [1] - 17:18 cooperatively [1] - 5:6 Corey [1] - 1:15 correct [3] - 5:5, 10:11, 20:13 counsel [3] - 2:21, 4:16, 15:11 couple [1] - 17:14 course [3] - 3:21, 3:23, 4:25 court [2] - 2:3, 4:2 COURT [27] - 1:1, 2:7, 3:25, 4:5, 4:9, 4:11, 6:2, 6:14, 8:5, 8:24, 9:4, 9:12, 10:7, 10:19, 10:22, 11:9, 11:13, 11:17, 11:25, 12:18, 14:24, 15:23, 16:8, 17:23, 18:7, 18:16, 19:8 Court [25] - 1:19, 1:19, 3:11, 5:10, 5:14, 5:25, 6:3, 6:5, 7:16, 8:2, 8:21, 8:22, 10:5, 12:5, 12:10, 12:17, 14:5, 15:13,
2	2018 [1] - 13:2 2019 [5] - 13:5, 13:11, 13:14, 13:24 2020 [1] - 13:14 2021 [2] - 1:12, 10:18 22 [1] - 1:12 24 [1] - 13:23	B
3	30 [2] - 3:12, 3:13 30,000-foot [1] - 12:20 3rd [1] - 10:18	bear [1] - 7:7 began [1] - 13:24 begin [1] - 16:19 behalf [1] - 11:21 belonging [1] - 14:8 bench [1] - 2:9 best [2] - 20:9, 20:15 between [3] - 3:22, 12:16, 15:14 beyond [1] - 10:4 big [1] - 16:24 bit [2] - 3:24, 5:4 bother [1] - 7:16 Brady [4] - 17:2, 17:8, 17:20, 18:13 break [2] - 2:10, 14:20 breaking [1] - 14:21 briefing [1] - 16:15 BROCKMAN [1] - 1:7 Brockman [14] - 4:19, 5:19, 7:12, 11:3, 11:4, 11:7, 11:8, 13:8, 13:9, 14:8, 14:16, 16:16, 17:19, 17:22 brockman [1] - 5:3 Brockman's [6] - 4:21, 5:22, 7:7, 13:1, 15:11, 16:18
4	4:21-000009-1 [1] - 1:4	C
9	90 [2] - 3:17, 4:22	California [2] - 5:13, 14:2 capacity [1] - 12:4
A	ability [3] - 7:5, 20:9, 20:15 able [4] - 6:2, 7:24, 12:22, 15:22 absolutely [3] - 5:5, 7:24, 9:2 accommodate [1] - 10:6 Act [1] - 3:23 actual [1] - 6:21 address [2] - 3:3, 14:11 aforesaid [1] - 20:14 afternoon [2] - 2:10, 11:14 ago [1] - 13:25 agree [1] - 7:15 agreeable [1] - 12:16 agreed [5] - 5:9, 5:17, 5:21, 7:25, 9:20 agreement [6] - 6:1, 8:7, 8:8, 8:16, 8:17, 8:19 agrees [3] - 2:25, 5:10, 5:14 ahead [3] - 4:13, 7:1, 12:8	

15:15, 18:2, 18:18, 18:24, 20:5, 20:6, 20:21 Court's [1] - 12:13 covered [1] - 10:21 CRC [3] - 1:18, 20:4, 20:20 criminal [1] - 18:21 CRR [3] - 1:18, 20:4, 20:20 culled [1] - 15:18 custodial [2] - 5:20, 5:24 custody [1] - 14:8 cut [3] - 15:6, 17:23, 18:8	effect [1] - 19:5 efficiently [1] - 17:25 either [1] - 13:18 elected [1] - 14:10 end [2] - 12:11, 17:9 engaged [1] - 17:21 ensure [1] - 9:25 entered [2] - 10:17, 13:4 entitled [1] - 20:8 Eric [1] - 1:15 Esq [3] - 1:15, 1:15, 1:17 essentially [2] - 14:10, 17:7 ethical [1] - 16:19 evaluate [3] - 3:14, 4:19, 4:21 evaluation [2] - 5:17, 5:20 evaluations [1] - 6:23 evasion [1] - 17:21 event [1] - 16:20 eventually [1] - 13:4 exactly [1] - 2:21 examination [1] - 5:23 examine [1] - 13:10 examined [1] - 7:12 exchange [2] - 3:14, 17:18 exchanges [1] - 13:13 excludable [5] - 9:18, 9:23, 10:1, 10:9, 10:17 excluded [2] - 3:22, 9:20 excused [1] - 19:13 expect [4] - 9:9, 18:3, 19:2 expecting [1] - 17:12 expert [1] - 5:22 experts [2] - 3:14, 4:19 expire [1] - 10:9	forthcoming [1] - 13:13 forward [7] - 2:15, 2:22, 9:14, 10:25, 15:4, 19:10, 19:11 Friday [5] - 6:7, 8:6, 9:14, 18:18 full [1] - 20:13
	D date [3] - 4:25, 9:21, 18:22 dates [2] - 8:3, 13:3 days [4] - 3:12, 3:13, 3:17, 4:22 deadline [1] - 17:25 deadlines [1] - 9:8 December [1] - 17:5 decided [1] - 7:22 Defendant [2] - 1:8, 1:17 defendant's [1] - 3:9 defense [3] - 2:21, 7:9, 12:2 defer [2] - 12:1, 12:7 delay [8] - 2:8, 9:18, 9:20, 10:1, 10:9, 10:17, 14:7 designations [1] - 20:10 desire [2] - 7:4, 7:5 different [1] - 14:1 difficult [1] - 6:11 discovery [6] - 3:2, 3:4, 4:17, 6:20, 16:23, 17:9 discussion [1] - 12:19 dispute [1] - 12:15 DISTRICT [2] - 1:1, 1:2 district [1] - 14:1 District [9] - 1:19, 1:20, 5:13, 14:2, 15:15, 15:16, 17:6, 20:6 Docket [1] - 10:16 doctor [1] - 7:11 Document [1] - 13:23 document [2] - 10:16, 13:8 documented [1] - 10:1 documents [10] - 13:7, 13:12, 13:16, 13:20, 13:24, 14:8, 14:17, 14:18, 15:18, 16:24 done [3] - 4:18, 8:11, 9:18 down [1] - 9:7 due [2] - 14:1, 16:17	G general [1] - 7:25 GEORGE [1] - 1:3 Giglio [1] - 17:9 given [1] - 16:23 government [19] - 2:20, 2:24, 2:25, 3:8, 4:18, 5:6, 5:8, 5:17, 7:3, 7:10, 7:19, 9:24, 10:6, 11:16, 13:22, 14:17, 16:22, 17:11, 17:17 great [12] - 2:7, 4:5, 6:2, 8:5, 9:15, 10:22, 11:9, 11:12, 14:24, 14:25, 16:2, 19:8 guess [1] - 14:25 guys [1] - 6:10
	F facility [1] - 13:1 fact [1] - 15:13 fair [1] - 18:12 far [1] - 7:1 figure [1] - 7:14 file [6] - 8:2, 8:15, 8:19, 9:17, 9:25, 12:11 filed [8] - 8:25, 9:3, 9:4, 10:25, 12:10, 13:22, 15:2 filings [2] - 3:10, 17:25 filings [1] - 19:11 filter [7] - 12:5, 13:4, 13:6, 13:22, 14:16, 14:22, 15:14 first [3] - 2:13, 9:3, 11:22 five [1] - 16:23 following [1] - 2:3 foregoing [2] - 20:8, 20:12 forrest [1] - 4:6 Forrest [5] - 1:18, 4:4, 20:4, 20:19, 20:20 forth [4] - 5:14, 7:24, 13:5, 17:15	H half [1] - 14:18 hand [1] - 17:10 HANKS [1] - 1:3 happy [1] - 10:6 health [2] - 7:7, 16:18 hear [2] - 15:25, 16:2 heard [2] - 7:10, 13:17 hearing [21] - 2:17, 2:19, 3:1, 3:6, 3:18, 3:20, 3:22, 4:24, 5:8, 5:9, 5:15, 5:19, 6:21, 8:4, 8:10, 8:11, 8:21, 9:1, 10:3, 11:11, 20:8 hearings [1] - 6:25 held [2] - 2:3, 2:4 helpful [2] - 8:6, 16:4 hesitate [1] - 19:4 high [1] - 12:23 hold [1] - 17:8 holders [1] - 13:7 home [1] - 12:25 Honor [15] - 2:23, 4:9, 4:10, 4:15, 5:2, 9:11, 10:2, 11:8, 11:16, 12:1, 15:8, 16:6, 18:6, 18:12, 19:7 HONORABLE [1] - 1:3 hope [1] - 8:19 hopefully [1] - 7:16 Houston [1] - 1:11
		I immunized [1] - 17:18 impede [1] - 7:5

<p>important [1] - 14:7 include [2] - 8:9, 17:25 incredible [1] - 14:6 indicted [1] - 14:16 indiscernible [1] - 20:9 indulgence [1] - 12:13 inexcusable [1] - 14:7 information [4] - 6:25, 17:10, 17:12, 18:14 input [1] - 6:5 intend [1] - 7:5 intended [1] - 17:8 interested [1] - 7:11 interference [1] - 20:10 interrupt [1] - 15:24 interrupted [1] - 6:16 intonated [1] - 17:8 issue [3] - 10:8, 10:13, 16:13 issues [3] - 2:18, 3:2, 8:20 issuing [1] - 3:8</p>	<p>line [1] - 11:3 litigation [1] - 15:19 location [1] - 5:22 log [2] - 14:21 look [3] - 16:9, 19:10, 19:11 looking [1] - 4:23</p>	<p>needing [1] - 12:11 needs [3] - 4:17, 8:1, 8:11 next [8] - 3:9, 6:7, 8:6, 9:3, 9:5, 9:14, 18:18, 19:11 Nichole [5] - 1:18, 4:3, 20:4, 20:19, 20:20 nichole_forrest@txs.uscourts.gov [1] - 1:20 nilly [1] - 17:11 non [1] - 5:20 non-custodial [1] - 5:20 normally [1] - 7:1 Northern [3] - 5:13, 14:2, 17:6 note [1] - 11:3 nothing [1] - 13:18 number [2] - 6:22, 10:16</p>
<p>J</p>	<p>manager [1] - 9:8 MANAGER [1] - 4:3 marker [1] - 19:1 material [4] - 17:2, 17:20, 18:1, 18:22 materials [2] - 2:11, 13:10 matter [6] - 5:11, 12:5, 14:1, 14:3, 17:7, 20:12 mean [4] - 15:6, 15:23, 17:17, 17:23 meaning [1] - 17:20 mechanical [1] - 1:22 medical [11] - 3:5, 3:9, 4:21, 6:9, 6:22, 7:4, 7:6, 8:9, 8:12, 8:14, 9:13 meet [1] - 17:4 meet-and-confer [1] - 17:4 mentioned [1] - 6:19 merits [2] - 12:19, 15:24 middle [2] - 2:8, 16:13 might [1] - 10:9 million [1] - 16:23 minimum [1] - 4:21 Monday [1] - 8:20 money [1] - 17:21 months [2] - 14:14, 15:20 motion [14] - 3:10, 5:12, 6:21, 7:17, 7:22, 8:15, 8:19, 8:25, 9:3, 12:3, 12:11, 15:1, 18:1, 18:13 motions [10] - 9:12, 9:22, 10:25, 12:10, 12:21, 15:1, 15:10, 18:10, 18:23, 19:2 move [3] - 10:25, 15:4, 18:4 moving [1] - 2:22</p>	<p>object [1] - 3:2 obligation [1] - 16:19 obtain [1] - 3:9 obtaining [2] - 8:14, 15:18 obviously [3] - 16:16, 18:19, 18:25 OF [3] - 1:2, 1:4, 1:10 office [1] - 12:25 OFFICIAL [1] - 1:10 Official [3] - 1:19, 20:5, 20:21 once [1] - 10:24 one [7] - 4:1, 5:12, 9:22, 11:2, 16:13, 17:5, 17:15 open [1] - 2:3 opportunity [1] - 18:11 opposed [2] - 5:11, 5:23 OR [1] - 20:1 oral [1] - 15:3 orally [1] - 8:22 order [7] - 3:12, 5:11, 6:3, 8:2, 10:15, 10:17, 19:6 ordering [1] - 5:15 outlining [1] - 8:20 overview [2] - 14:24, 14:25 own [1] - 7:9</p>
<p>K</p>	<p>key [1] - 15:2 kind [2] - 12:20, 16:3 kindly [1] - 18:13</p>	<p>P</p>
<p>L</p>	<p>last [1] - 17:5 late [1] - 18:19 laundering [1] - 17:22 law [1] - 10:12 lawyer [2] - 13:1, 14:9 lead [1] - 5:18 leading [1] - 8:3 least [2] - 3:17, 14:19 letter [3] - 13:13, 17:15, 17:16 letters [1] - 13:18 level [1] - 12:23 likely [1] - 16:17 limited [2] - 12:4, 14:4</p>	<p>pages [1] - 16:24 paper [1] - 16:2 paragraph [1] - 17:16 parameters [2] - 7:15, 7:25 part [1] - 18:1 particular [2] - 7:20, 17:4 parties [5] - 2:12, 9:17, 12:16, 16:1, 19:3 people [1] - 11:5 perceived [1] - 14:11 perfect [1] - 10:19</p>
	<p>N</p>	

<p>perhaps [2] - 8:20, 12:14 permissibly [1] - 15:22 pertaining [1] - 7:6 place [7] - 5:15, 5:18, 6:8, 8:1, 10:25, 19:1, 19:6 place-marker [1] - 19:1 Plaintiff [2] - 1:5, 1:15 plan [3] - 2:15, 2:22, 18:22 plans [1] - 3:8 pleadings [3] - 2:25, 16:5, 16:7 point [2] - 4:22, 14:15 possession [1] - 13:8 possible [1] - 4:23 possibly [1] - 2:18 potential [1] - 12:15 Powers [1] - 1:15 powers [4] - 11:19, 11:25, 13:15, 15:6 POWERS [3] - 12:1, 15:8, 16:6 precluded [1] - 20:11 prefers [1] - 12:10 prepare [3] - 3:5, 5:11, 16:20 prepared [1] - 12:20 preparing [2] - 8:14, 8:19 present [2] - 7:7, 11:11 presently [1] - 9:19 PRESIDING [1] - 1:3 pretty [1] - 12:22 prevented [2] - 15:17, 15:21 preview [1] - 12:14 primary [1] - 17:16 priority [1] - 16:10 privilege [2] - 13:7, 13:10 problem [5] - 4:11, 4:16, 10:14, 18:16, 18:20 proceed [2] - 2:14, 16:17 proceeding [2] - 7:21, 19:2 PROCEEDINGS [2] - 1:10, 2:1 Proceedings [3] - 1:22, 2:4, 19:15 proceedings [2] - 2:3, 20:14 process [3] - 5:7, 13:6, 17:9 produce [2] - 6:12, 18:1 produced [2] - 1:23, 3:12 production [1] - 8:8 productive [1] - 18:9 proposal [1] - 3:7 proposed [1] - 7:15 prosecution [2] - 11:15, 12:24 prosecutors [1] - 17:6 protocol [3] - 5:7, 13:4, 13:17 provide [4] - 6:3, 13:6, 14:23, 15:13 provided [1] - 16:22 provides [1] - 15:11 pursuant [2] - 10:20, 13:17 push [2] - 3:24, 4:25 put [3] - 5:16, 16:1, 18:17 </p>	<p style="text-align: center;">Q</p> <p>questions [1] - 17:1 quick [1] - 4:1 quickest [1] - 17:24 quickly [4] - 12:22, 16:10, 16:11, 17:13 quite [1] - 3:24</p> <p style="text-align: center;">R</p> <p>raise [4] - 2:18, 12:2, 12:9, 16:12 ran [2] - 12:24, 13:25 RDR [3] - 1:18, 20:4, 20:20 read [1] - 2:16 really [3] - 15:25, 16:3, 18:9 receive [1] - 12:21 record [6] - 4:14, 5:16, 6:1, 9:6, 11:2, 11:10 recorded [2] - 1:22, 20:15 records [16] - 3:5, 3:10, 3:12, 4:21, 6:10, 6:11, 6:23, 7:4, 7:6, 8:9, 8:12, 8:14, 9:13, 13:16, 14:23, 16:25 reflected [1] - 11:10 reflects [1] - 12:3 regarding [1] - 9:17 released [1] - 17:12 relevant [1] - 7:6 rely [1] - 16:7 remarks [1] - 11:24 render [1] - 7:8 repeatedly [1] - 17:1 report [1] - 13:21 Reported [1] - 1:18 reporter [1] - 4:2 Reporter [4] - 1:19, 1:23, 20:5, 20:21 REPORTER [1] - 4:9 REPORTER'S [1] - 1:10 reports [3] - 3:14, 3:15, 6:22 represent [2] - 12:4, 14:12 request [1] - 8:10 required [1] - 7:20 requires [1] - 16:15 residence [1] - 12:25 resolution [1] - 15:4 resolved [1] - 16:11 respect [2] - 6:9, 11:24 respond [4] - 5:4, 9:1, 15:10, 18:11 response [1] - 13:18 review [2] - 12:6, 15:22 reviewed [1] - 2:11 reviewing [2] - 13:24, 15:17 roadblock [1] - 13:25 ROBERT [1] - 1:7</p>	<p>Robert [1] - 11:7 role [1] - 12:14 rule [1] - 15:9 rulings [2] - 15:15 runs [1] - 10:17</p> <p style="text-align: center;">S</p> <p>safe [1] - 3:19 schedule [5] - 7:23, 9:14, 10:24, 18:2, 18:17 scheduling [1] - 19:5 scroll [1] - 11:6 sealed [2] - 14:1, 14:4 search [3] - 12:6, 12:24, 14:3 see [2] - 11:6, 14:13 seeking [1] - 4:18 separate [1] - 14:3 series [1] - 13:3 services [1] - 15:19 set [7] - 7:24, 8:21, 9:1, 9:21, 10:3, 13:5, 17:15 sets [1] - 5:14 setting [3] - 5:24, 6:4, 8:3 several [1] - 15:19 short [3] - 3:16, 8:2, 10:21 shortly [1] - 15:12 side [2] - 3:19, 8:25 sides [1] - 18:11 sign [1] - 8:2 signed [1] - 6:3 simply [3] - 12:4, 14:23, 15:12 sit [1] - 13:19 skill [1] - 20:15 SMITH [6] - 2:23, 4:15, 8:13, 9:2, 9:11, 11:15 Smith [5] - 1:15, 4:12, 5:4, 6:19, 17:15 so.. [1] - 9:10 sometime [2] - 3:19, 4:24 soon [1] - 13:13 sorry [6] - 4:6, 4:12, 6:14, 6:16, 15:6, 15:23 sort [5] - 2:14, 5:7, 5:24, 7:11, 17:2 SOUTHERN [1] - 1:2 Southern [3] - 1:20, 15:16, 20:6 speedy [1] - 9:23 Speedy [1] - 3:23 spoken [1] - 20:11 Spring [1] - 13:11 start [1] - 2:20 statements [1] - 17:19 STATES [2] - 1:1, 1:4 States [2] - 1:19, 20:6 status [2] - 8:13, 13:21 STATUS [1] - 1:9 stenography [1] - 1:22 still [3] - 13:16, 13:19, 14:3 </p>
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stipulation [1] - 9:17 storage [1] - 13:1 submit [3] - 16:8, 18:18, 18:21 submitted [1] - 2:12 subpoena [1] - 7:4 subpoenas [2] - 3:8, 7:15 switched [1] - 4:7	unsatisfactory [1] - 17:3 unsuccessful [1] - 16:21 up [9] - 5:7, 5:18, 8:3, 8:21, 9:9, 10:2, 12:11, 14:5, 15:3
T	V
taint [3] - 11:21, 12:14, 14:10 tax [4] - 13:1, 14:9, 17:21 team [12] - 11:16, 11:21, 12:5, 12:24, 13:4, 13:6, 13:22, 14:10, 14:16, 14:22, 15:14, 15:19 team's [1] - 12:14 tee [1] - 14:5 TELEPHONIC [1] - 20:1 telephonic/video [1] - 20:7 term [1] - 10:21 TEXAS [1] - 1:2 Texas [4] - 1:11, 1:20, 15:16, 20:7 THE [27] - 1:3, 2:7, 3:25, 4:5, 4:9, 4:11, 6:2, 6:14, 8:5, 8:24, 9:4, 9:12, 10:7, 10:19, 10:22, 11:9, 11:13, 11:17, 11:25, 12:18, 14:24, 15:23, 16:8, 17:23, 18:7, 18:16, 19:8 they've [2] - 5:21, 16:23 three [1] - 14:18 timetable [1] - 6:8 timetables [1] - 6:4 Timine [1] - 17:21 today [3] - 6:7, 10:9, 13:19 took [1] - 15:19 top [1] - 16:10 transcribed [1] - 20:7 TRANSCRIPT [1] - 1:10 transcript [3] - 1:23, 2:16, 20:13 trial [9] - 2:9, 3:24, 4:8, 4:25, 9:21, 9:23, 16:17, 16:20 Trial [1] - 3:23 true [1] - 20:13 trying [2] - 5:6, 7:14 two [1] - 14:18 two-and-a-half [1] - 14:18 typewritten [1] - 20:12	Varnado [4] - 1:17, 5:3, 11:17, 12:7 VARNADO [16] - 5:2, 6:13, 6:15, 9:19, 10:15, 10:20, 11:4, 11:12, 11:18, 12:8, 12:23, 15:5, 16:12, 18:5, 18:12, 19:7 vast [1] - 16:22 via [1] - 2:4 video [2] - 6:17, 11:5 VIDEO [1] - 20:1 view [1] - 12:20 views [1] - 15:14 vs [1] - 1:6
W	W
	waiting [1] - 11:18 warrant [2] - 12:6, 14:3 warrants [1] - 12:25 Wednesday [2] - 9:5, 9:13 week [3] - 3:9, 9:3, 19:11 weeks [2] - 15:20, 17:14 welcome [1] - 2:7 willy [1] - 17:11 willy-nilly [1] - 17:11 witness [1] - 17:17 witnesses [1] - 17:11 words [1] - 20:11 write [1] - 3:14 writing [2] - 9:7, 16:1
Y	
	y'all [1] - 19:12 year [2] - 13:25, 17:5 years [2] - 14:18, 14:19 yesterday [1] - 13:23
Z	
U	Zoom [2] - 2:4, 2:9